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August 10, 2009

Board of Governors of the Federal Reserve Board  
20<sup>th</sup> and C Streets, NW  
Washington, DC 20551

Re: Interim Final Rule Implementing the Credit Card Accountability Responsibility and Disclosure Act

Dear Board of Governors:

I am writing to respectfully request that you delay compliance with the 21-day notice provisions for open-end plans other than credit cards, set to take effect August 20, 2009, under the Board's new interim final rule implementing the Credit Card Accountability Responsibility and Disclosure Act of 2009 (CARD Act).

My credit union, Cy-Fair Federal Credit Union, is located in the northwest area of Houston, Texas and has approximately 19,000 members. As the Compliance Officer, I fully understand and agree with the importance of regulatory compliance requirements for financial institutions. Since our credit union has never been involved in any type of predatory credit card practices, we supported this act as it was originally written and passed. However, we now face the frustration of complying with problematic provisions that were added to this bill at the last minute without any discussion with affected stakeholders, such as credit unions. As supporters, we do not believe that the inclusion of all open-end plans, which includes our general lines of credit, signature loans and other types of loans permitted under open-end lending, was in any way the intent of the original bill nor our understanding of the bill.

Our credit union, like most credit unions across the county, offer open-end lending and provide our members with consolidated statements that combine information about all savings, checking and loan accounts our members have with us. The convenience of this type of statement, along with the cost efficiency, is appreciated by our members. And as most credit unions, we allow our members to choose biweekly and semi-monthly payments and designate the due dates for their payments to coincide with not only their payroll schedules, but their monthly budget. While this practice not only allows our members to utilize payroll deduction for their loan payments, it also results in a savings to the member in interest costs.

In order for our credit union to comply with the provisions of this final rule, we are evaluating changes to both of these practices. These changes will not only result in confusion to our members with loan accounts, but will also bring about increased costs that will in turn be realized by our members. This causes me to ask "how are these provisions in the best interest of the consumer, our member?" Open-end lending, as practiced by credit unions for over 30 years, was embraced by our members when we began offering the product approximately 18 years ago. The changes required to comply with this revised act will cause

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many credit unions to rethink the offering of this product, which in turn will have a negative impact on our members.

In our attempt to be in compliance by August 20, 2009, we began the process of outlining steps to implement the necessary changes. When we originally learned of the revisions to the act, we assumed we would be able to include not only the due date of loans for the current month, but also for the next month, thereby complying with the 21-day notice requirement. While this would still result in an increase in the number of statements that would have to be mailed monthly as opposed to quarterly, there would be little or no direct impact on the structure of the members' loans. However, since we have been informed by representatives of the Federal Reserve Board that this solution would not be in the "spirit" of the law, we have had to look at other options. These options involve not only massive changes to the internal set up of our open-end loans, but will also require lengthy communication to the members whose loans will be involved. We anticipate a great deal of confusion and frustration once this communication is sent. We feel our members will not understand why their loan repayment due dates are being changed and will be concerned about revising their monthly budgets to fit the new payment schedules.

Due to the reasons that I have stated above, I would urge the Board to use its authority under the Truth In Lending Act to allow more time for credit unions to comply with these provisions. I would also respectfully ask that the Board permit credit unions to continue to utilize consolidated statements by placing on each members monthly statements the dates on which all covered payments are due in the current month and the next month; ensuring that members receive at least 21-day notice for all open end payments. This option will still require additional time for compliance, as we have been notified by our core data processors that this option is not available at this time and will require a set up change.

Cy-Fair Federal Credit Union is dedicated to building life long relationships while providing premier service and personalized financial solutions to enrich each member's life. This is not merely our mission statement, it has been the aspiration of credit unions since their inception in the early 1900s.

I ask that you consider the requests made above and spare the 92 million credit union members of the negative effect that the rapid compliance with this CARD Act will produce.

Sincerely,

A handwritten signature in cursive script that reads "Susan Bradley".

Susan Bradley  
Compliance Officer  
Cy-Fair Federal Credit Union